

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BRUSH DENTAL DOMAIN, P.C., §

Plaintiff, §

v. §

SWISH DENTISTRY, P.L.L.C., §

ET AL., §

Defendants. §

CIVIL ACTION NO. 4:21-cv-02113

JUDGE CHARLES ESKRIDGE

DEFENDANTS' AMENDED INITIAL DISCLOSURES

Defendants Swish Dentistry, P.L.L.C. and Anna M. Munne, D.D.A., P.A. make the following amended initial disclosures, subject to supplementation as discovery progresses, under Rule 26(a)(1)(A).

A. Individuals Likely to Have Discoverable Information

Name of Person	Description of What the Person Knows
Brush Dental Domain, P.C.	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Viraj Desai, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Brendan Loehr, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.

Audrey Lawson, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
William Brooks, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Brittany Thompson, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Andrew Hatashima, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Christie Tu, DDS	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Shima Shadman, DDS	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Jessica Xia, DDS	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Tarek Sirage, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Rose Duong, DDS	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.

Jason Sampat, DMD	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Other employees of Brush Dental Domain, P.C.	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Swish Dentistry, P.L.L.C.	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Anna M. Munne, D.D.S. P.A.	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Anna M. Munne, DDS	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Employees of Defendant Anna M. Munne, D.D.A. P. A.	Knowledge of the events set forth in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Any and all persons initially designated by Plaintiff or subsequently designated by Plaintiff or Defendants, to which reference is here made.	

B. LIST OF DOCUMENTS AND ESI

Documents, Electronically Stored Information, or Tangible Things
Plaintiff has documents and ESI in its possession that are relevant to the allegations made in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.
Defendants have documents and ESI in its possession that are relevant to the allegations made in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks. Relevant documents have been produced or are being produced in response to Plaintiff's Request for the production of documents.

The United States Patent and Trademark Office has documents and ESI in its possession that are relevant to the allegations made in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.

The Texas Secretary of State may have documents and ESI in its possession that are relevant to the allegations made in the First Amended Complaint and Defendants' Answer and Counterclaim to cancel Plaintiff's trademarks.

C. COMPUTATION OF DAMAGES

Defendants are not currently claiming any damages. Defendants do seek attorney's fees and costs of litigation. Defendants will supplement this response if Defendants elect to seek damages of any kind.

D. INSURANCE

Defendants do not have insurance that would indemnify or reimburse for payment made to satisfy a judgment.

Date: February 23, 2022

Respectfully submitted,

THE VETHAN LAW FIRM, P.C.

By: /s/ Joseph L. Lanya

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All Rule 5 service documents should be
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Email: edocs@vwtexlaw.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of copy of this instrument was served on all parties, represented through counsel or *pro se*, through ECF, email and/or Certified Mail, pursuant to the Federal Rules of Civil Procedure, on this 23rd day of February 2022, as follows:

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**ATTORNEYS FOR PLAINTIFF
BRUSH DENTAL DOMAIN, P.C.,
D/B/A SWISH DENTAL**

By: /s/ Joseph L. Lanza
Joseph L. Lanza